URS

Dames & Moore
URS Greiner Woodward Clyde

March 22, 2002
URS Project 49-91C73436.02

Mr. Chuck Williams
Project Manager
ARTD/RCAP
U.S. Environmental Protection Agency, Region VII
901 North 5th Street
Kansas City, Kansas 66101

Re: Source Area Soil Investigation
Former Sheller-Globe Facility
3200 Main Street, Keokuk, Iowa
U.S. EPA Docket No. VII-91-H-0040

Dear Mr. Williams:

This letter, presented on behalf of United Technologies Corporation (UTC) (on behalf of Lear Corporation Automotive Systems) and Metzeler Automotive Profile Systems Iowa, Inc., presents proposed activities to better define the current degree and extent of volatile organic constituents (VOCs) remaining within source area soils at the former Sheller-Globe Facility at 3200 Main Street in Keokuk, Iowa. A soil vapor extraction (SVE) system has been operating since March 1999 to remove VOCs from vadose zone soils around the Chemical Mixing Building. Soil samples were collected from 10 soil borings (ISB-1 through ISB-10) as part of the Interim Soil Investigation performed in April 2001 to evaluate the effectiveness of the SVE system in removing the VOCs. While the SVE system appears to have removed a substantial amount of the VOCs in soil, concentrations at three sample locations on the east side of the Chemical Mixing Building (ISB-6, ISB-8, and ISB-9) were above prospective soil cleanup standards (see Drawing 1). The full extent of VOCs exceeding the prospective cleanup standards is not known. Therefore, we are proposing to complete this supplemental sampling in order to better support the evaluation of alternatives in the Corrective Measure Study by:

- Better defining the extent of soils which may need further treatment
- Evaluating the areal extent of a sand zone within the treatment area which may reducing the effectiveness of the SVE system in a portion of the fill by allowing preferential air flow through it

The proposed investigation consists of collecting soil samples from 16 soil borings whose approximate locations within the source area shown on Drawing 1. The soil samples will be collected and analyzed for VOCs in general accordance with the Quality Assurance Project Plan dated July 1, 1999. Specifically, the soil borings will be continuously sampled to a termination depth of 10 feet using direct push methods. The soil core will be logged by a qualified geologist or engineer according to the Unified Soil Classification System. Samples from the unsaturated portion of the soil core will be collected for field screening. The portion of the soil core with the

URS Corporation
10975 El Monte, Suite 100
Overland Park, KS 66211
Tel: 913.344.1000
Fax: 913.344.1011

URS
Dames & Moore
URS Greiner Woodward Clyde

highest levels of VOCs, as indicated by the field screening, will be submitted for chemical analysis. As noted above, a thin sand zone has been observed in some borings within the source area at an approximate depth of five to six feet below surface. This sand zone may be acting as a preferential flow pathway reducing the effectiveness of the SVE system in the clay portion of the fill. If this sand zone is observed within a boring, then field personnel will attempt to collect soil samples from above and below the sand zone based on field screening results. This will provide information on whether soils above and below the sand zone will require further treatment.

Soil samples will be analyzed by EPA Method 8260B. A duplicate sample and an equipment blank will be collected per every 10 soil samples submitted for chemical analysis. A matrix spike and matrix spike duplicate sample will be collected per every 20 samples submitted for chemical analysis. In addition, one trip blank will be sent in every sample cooler sent to the analytical laboratory. It is anticipated that the analytical work will be performed by Severn-Trent Laboratories in Austin, Texas.

After reaching termination depth, the soil borings will be abandoned in accordance with State of Iowa requirements. The results of the soil sampling will be presented in the Corrective Measure Study Report.

If you have any questions or comments about this proposed investigation plan, please feel free to call Mr. Rick Meyer. He can be reached at (860) 728-7586.

Very truly yours,
URS Corporation

Klaas J. Doeden
Project Hydrogeologist

David A. Dods
Senior Environmental Engineer

Enclosure

cc: Rick Meyer, UTC
Joseph Gregg, Esq., Eastman & Smith
Dale Guariglia, Esq., Bryan Cave LLP
Shawn McAfee, Metzeler
Matt Germane, Envirogen
Dennis Brinkley, Harding ESE

MW-7

ISB-4

P-6

MW-5

APPROXIMATE LOCATION OF FORMER UNDERGROUND GASOLINE STORAGE TANK

ISB-3

SVE DISTRIBUTION BUILDING #2

ISB-7

ISB-5

TOLUNE AST

SVE DISTRIBUTION BUILDING #1

ISB-2

ISB-1

ISB-6

MW-3

DRUM STORAGE

CHEMICAL MIXING BUILDING

MW-9

SVE MAIN EQUIPMENT BUILDING

MW-1

MW-4

ISB-8

MW-2

ISB-9

MW-22

ISB-10

APPROXIMATE LOCATION OLD HAZARDOUS WASTE STORAGE AREA

RETAINING WALL

SIDEWALK

MW-10

MW-10A

MW-13A

MW-13

LEGEND:

- PROPOSED BORINGS
- P-6 EXISTING FILL PIEZOMETER
- MW-3 EXISTING FILL MONITORING WELL
- MW-9 EXISTING TILL MONITORING WELL
- ISB-8 INTERIM SOIL SAMPLE LOCATION
- RAILROAD TRACKS
- MC MANHOLE COVER
- DRAIN INLET
- EDGE OF PARKING LOT/PAVED AREA
- GAS UNDERGROUND GAS LINE
- UGE UNDERGROUND ELECTRICAL LINE
- UGT UNDERGROUND TELEPHONE LINE
- W UNDERGROUND WATER LINE
- AIR UNDERGROUND AIR LINE
- UNDERGROUND FORMER PRODUCT LINE
- ST UNDERGROUND STORM SEWER LINE
- 630 GROUND SURFACE TOPOGRAPHIC CONTOUR LINE–CONTOUR INTERVAL IS 2 FEET
- FENCE LINE
- TREE LINE
- FORMER TANK EXCAVATION AREA
- POTENTIAL "HOT SPOT" WITH VOC CONCENTRATIONS EXCEEDING PROSPECTIVE SOIL CLEANUP STANDARDS

N

20 0 20 40

SCALE FEET

URS Corporation
10975 El Monte, Suite 100
Overland Park, Kansas 66211

CLIENT: UNITED TECHNOLOGIES CORPORATION

LOCATION: 3200 MAIN STREET, KEOKUK, IOWA

TITLE: **PROPOSED DIRECT PUSH BORING LOCATION MAP**

DRAWN BY	CHK'D. BY	APPROVED BY
R.A.D.	K.J.D.	D.A.D.
PROJ. NO.	DATE	DWG. NO.
4991C73436.02	03/14/02	- 1

March 21, 2002 2:00:39 pm (RAD)
J:\91C73436.02\00015-01.dwg